



VIA ECF

The Honorable Gary Stein
United States District Court
500 Pearl Street, Room 702
New York, New York 10007

MEMO ENDORSED

Re: *Lozada v. TaskUs, Inc.*, Case No. 1:22-cv-01479 (S.D.N.Y.)

Dear Judge Stein:

Pursuant to Paragraph 14 of the Stipulated Confidentiality Agreement and Protective Order (ECF 63), Section III.H.2 of Your Honor's Individual Practices in Civil Cases, the Court's Standing Order, 19-mc-583, and the Court's ECF Rules & Instructions, Section 6, I write on behalf of Plaintiffs Humberto Lozada and Oklahoma Firefighters Pension and Retirement System (together, "Plaintiffs"), to respectfully request permission of the Court to file the unredacted version of Plaintiffs' September 25, 2024 letter motion (the "Motion") and accompanying Appendices 1 through 5 (which contain the relevant excerpts from the TaskUs Privilege Log, dated August 9, 2024, and BCP Privilege Log, dated August 19, 2024) and Exhibits 1 through 10 (documents produced by Defendants in this Action), under seal.

The parties have conferred and agree that these materials—which Defendants have designated as Confidential or Highly Confidential Discovery Material under the Stipulated Confidentiality Agreement and Protective Order (ECF 63)—may be sealed. Defendants did not withdraw any of their confidentiality designations at the meet and confer, but indicated that they may do so at a future time. Plaintiffs do not oppose these designations for purposes of this Motion.

Plaintiffs are concurrently filing the Motion and accompanying Appendices 1 through 5 and Exhibits 1 through 10 in redacted form and under seal pending the Court's ruling on this motion to seal.

Respectfully Submitted,

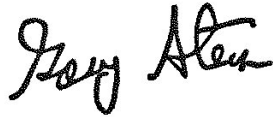
/s/ Joseph A. Fonti
Joseph A. Fonti

cc: Counsel of Record (via ECF)

Plaintiffs' application is granted. The unredacted version of Plaintiffs' September 25, 2024 Letter Motion (Dkt. No.135), accompanying Appendices 1 through 5, and Exhibits 1 through 10 shall hereby be maintained under seal. The Court finds that Plaintiffs' interest in maintaining the confidentiality of the documents outweighs the presumption of full public access to the judicial documents in which that information is contained. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). The Clerk of Court is respectfully directed to maintain the unredacted versions of Plaintiffs' September 25, 2024 Letter Motion and accompanying Appendices 1 through 5 and Exhibits 1 through 10. (Dkt. No. 135).

Date: April 23, 2025
New York, NY

SO ORDERED:

A handwritten signature in black ink, appearing to read "Gary Stein", is written over a horizontal line.

HON. GARY STEIN
UNITED STATES MAGISTRATE JUDGE